

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2017 NOV -8 AM 11:42

UNITED STATES OF AMERICA

v.

CRYSTAL LEANN SHARKEY,
aka "Crystal Leann Jordan" (1)

MICHAEL PAUL WATTS (2)

JASON WAYNE MCCLURE (3)

KELLIE LEA LOCKE (4)

MICHAEL BRANDON POWELL (5)

JODY HEATHER BAUSCH
aka "Jody Land" (6)

SCOTT RALPH LAND (7)

JEREMIAH JASON MCGREGOR
aka "Wicked" (8)

JAMES EARL GOODIN
aka "Bo" (9)

NICOLE JONI CULPEPPER (10)

KYLE QUINCY KETCHUM (11)

EMBER NICOLE BERG (12)

SHANNON MARIE MORGAN (13)

AARON DEWAYNE MARRS (14)

LESLIE IRENE CATES (15)

DEPUTY CLERK

FILED UNDER SEAL

NO.

3 - 17 CR - 573 - D

INDICTMENT

The United States Grand Jury Charges:

Introduction

1. The defendants, each of whom were methamphetamine dealers, resided in the area surrounding Lake Tawakoni, which is approximately 50 miles east of Dallas and

in the Northern District of Texas. Several of the defendants were members of or associated with the Aryan Circle, which is a white supremacist gang based primarily in Texas.

2. The Aryan Circle prison gang formed when certain ABT members splintered off to form what they believed was a more ideologically pure group. Aryan Circle members believed in the complete separation of the races. The Aryan Circle was also an organized crime group, but, in recent years, its white supremacy ideology often took a backseat to traditional criminal ventures, such as drug dealing. Female members of the Aryan Circle were often referred to as "Featherwoods."

3. Despite their differences, white supremacy gangs, like the Aryan Circle, often collaborate with Mexican gangs and cartels for purposes of drug distribution or other illegal ventures.

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
[Violation of 21 U.S.C. § 846 and 18 U.S.C § 2]

4. The allegations contained in paragraphs 1 through 3 are realleged and fully incorporated herein.

5. Between in or about January 2017, and in or about November 2017, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Crystal Leann Sharkey, Michael Paul Watts, Jason Wayne McClure, Kellie Lea Locke, Michael Brandon Powell, Jody Heather Bausch, Scott Ralph Land, Jeremiah Jason McGregor, James Earl Goodin, Nicole Joni Culpepper, Kyle Quincy Ketchum, Ember Nicole Berg, Shannon Marie Morgan, Aaron Dewayne Marrs, and Leslie Irene Cates** knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C); all in violation of 21 U.S.C. § 846 and 18 U.S.C. § 2.

Counts Two through Sixteen

Possession of a Controlled Substance with Intent to Distribute
[Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2]

6. The allegations contained in paragraphs 1 through 5 are realleged and fully incorporated herein.

7. On or about the dates listed below, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants listed below, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841 (a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

Count	Defendant	On/In or About
2	Crystal Leann Sharkey	September 25, 2017
3	Michael Paul Watts	June 5, 2017
4	Jason Wayne McClure	July 25, 2017
5	Kellie Lea Locke	July 26, 2017
6	Michael Brandon Powell	July 28, 2017
7	Jody Heather Bausch	August 16, 2017
8	Scott Ralph Land	August 16, 2017
9	Jeremiah Jason McGregor	August 20, 2017
10	James Earl Goodin	August 22, 2017
11	Nicole Joni Culpepper	August 25, 2017
12	Kyle Quincy Ketchum	September 12, 2017
13	Ember Nicole Berg	September 18, 2017
14	Shannon Marie Morgan	September 19, 2017
15	Aaron Dewayne Marrs	September 16, 2017
16	Leslie Irene Cates	October 30, 2017

Forfeiture Notice
[21 U.S.C. § 853(a)]

The allegations contained in paragraphs 1 through 7 of this Indictment are realleged and fully incorporated by reference for the purpose of alleging forfeitures pursuant to 21 U.S.C. § 853.

Upon conviction for any of the offenses alleged in Counts One through Fifteen of this Indictment, pursuant to 21 U.S.C. § 853(a), the defendants, **Crystal Leann Sharkey, Michael Paul Watts, Jason Wayne McClure, Kellie Lea Locke, Michael Brandon Powell, Jody Heather Bausch, Scott Ralph Land, Jeremiah Jason McGregor, James Earl Goodin, Nicole Joni Culpepper, Kyle Quincy Ketchum, Ember Nicole Berg, Shannon Marie Morgan, Aaron Dewayne Marrs, and Leslie Irene Cates** shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the respective offense. The property to be forfeited includes, but is not limited to, the following:

- a 12 gauge shotgun, serial number 749118 (as to **Ketchum** only);
- a New Haven, 20 gauge shotgun, serial number 1165893 (as to **Ketchum** only);
- a Jennings J-22LR .22 caliber pistol, serial number 658966 (as to **Ketchum** only);
- a Taurus PT140 .40 caliber pistol, serial number SZL70798 (as to **Ketchum** only);
and
- a Charter Arms .38 caliber revolver, serial number 275947 (as to **McGregor** only).

If any of the property described above, as a result of any act or omissions of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

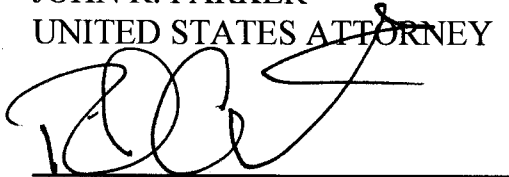
the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



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INDICTMENT

21 U.S.C. § 846 and 18 U.S.C § 2

Conspiracy to Possess with Intent to Distribute a Controlled Substance

21 U.S.C. § 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2

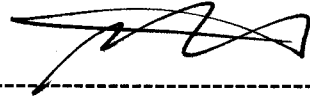
Possession of a Controlled Substance with Intent to Distribute

21 U.S.C. § 853(a)

Forfeiture Notice

16 Counts

A true bill rendered

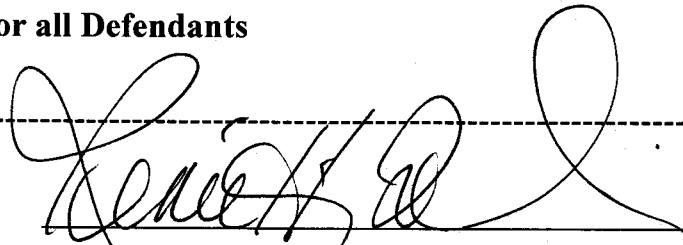


DALLAS

FOREPERSON

Filed in open court this 8th day of November, 2017

Warrant to be Issued for all Defendants



UNITED STATES MAGISTRATE JUDGE

No Criminal Matter Pending